

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

**IN RE 2014 RADIOSHACK ERISA
LITIGATION**

THIS DOCUMENT RELATES TO:

ALL ACTIONS

MASTER FILE NO. 4:14-cv-00959-O

**PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION
SETTLEMENT, CERTIFICATION OF SETTLEMENT CLASS
AND APPROVAL OF PLAN OF ALLOCATION**

Named Plaintiffs Jeffrey Snyder, Manoj P. Singh, and William A. Gerhart ("Plaintiffs"), on behalf of the Settlement Class of participants in the RadioShack 401(k) Plan and the RadioShack Puerto Rico 1165(e) Plan (the "Plans"), hereby respectfully move this Court, pursuant to FED. R. CIV. P. 23, for entry of the Final Approval Order and Judgment that:

1. Approves the proposed Class Action Settlement Agreement and Release Between Plaintiffs and Defendants Wells Fargo Bank, N.A. and Banco Popular De Puerto Rico (the "Settlement" or "Settlement Agreement") as fair, reasonable and adequate;
2. Approves the proposed Plan of Allocation;
3. Certifies the Settlement Class and appoints Named Plaintiffs as class representatives for the Settlement Class;
4. Appoints the law firms of Kessler Topaz Meltzer & Check, LLP ("KTMC"), Stull, Stull & Brody ("SSB"), and Connelly Wells & Gray LLP ("CWG") as Class Counsel for the Settlement Class, and Lackey Hershman L.L.P. ("Lackey Hershman") as Liaison Counsel for the Settlement Class;
5. Finally approves the Bar Order;

6. Determines that the Trustee Defendants complied with the Class Action Fairness Act (“CAFA”); and

7. Grants such other and further relief as the Court may deem just and proper.

The grounds for the Motion are set forth in the following papers filed contemporaneously herewith:

A. Memorandum in Support of Plaintiffs’ Motion for Final Approval of Class Action Settlement, Certification of Settlement Class and Approval of Plan of Allocation; and

B. Declaration of Mark K. Gyandoh in Support of Plaintiffs’ Motion for Final Approval of Class Action Settlement, Certification of Settlement Class, and Approval of the Plan of Allocation and Motion For an Award of Attorneys’ Fees, Reimbursement of Litigation Expenses and Case Contribution Awards to the Named Plaintiffs, and all exhibits thereto.

Dated: June 10, 2016

Respectfully submitted,

/s/ Mark K. Gyandoh

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CERTIFICATE OF SERVICE

I hereby certify that on June 10, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to registered CM/ECF participants.

/s/ Mark K. Gyandoh

Mark K. Gyandoh